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*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EXTENDING
TIME TO RESPOND TO QUANTA
ASSUMPTION MOTION**

Re: Dkt. No. 1218

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee
4 of Unsecured Creditors (the “**Creditors Committee**”) on the other. The Debtors and the
5 Creditors Committee are referred to in this Stipulation and Agreement for Order collectively as
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On April 3, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 Approving the Utility’s Assumption of*
10 *Certain Agreements with Quanta Energy Services, LLC*, filed by the Debtors on April 3, 2019
11 [Dkt. No. 1218] (the “**Quanta Assumption Motion**”), which is set for a hearing before the Court
12 at 9:30 a.m. on April 24, 2019. Any response or opposition to the Quanta Assumption Motion is
13 due by 4:00 p.m. (Pacific Time) on April 17, 2019.

14 B. Proposed counsel for the Creditors Committee has requested, and counsel for the
15 Debtors has agreed, that the time for the Creditors Committee to respond to the Quanta
16 Assumption Motion be extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
21 **THAT:**

22 1. The time for the Creditors Committee to file and serve any response or
23 opposition to the Quanta Assumption Motion is extended through 4:00 p.m. (Pacific Time) on
24 April 19, 2019.

25 [Signatures on next page]
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Dated: April 16, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: April 16, 2019

MILBANK LLP

/s/ Thomas R. Kreller

Thomas R. Kreller

*Proposed Attorneys for Official Committee
of Unsecured Creditors*